

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JEFFREY WELTHER,

Plaintiff,

v

SCHLOTTMAN & WAGNER, PC,
a Michigan Professional
Corporation.

Defendant. _____/

Case No. 2:14-cv-11001-SJM-MKM
Hon. Stephen J. Murphy III

AFFIRMATIVE DEFENSES

Defendants provide the following affirmative defenses to
plaintiff's complaint:

1. Statute of Limitations
2. Fraud
3. Breach of Contract
4. Not a consumer debt
5. Assumption of Obligation
6. Knowledge
7. Misrepresentation
8. Laches
9. Unclean Hands

10. Defendant reserves the right to file such other and
further relief as equity and good conscience require.

Respectfully submitted,

/s/ Thomas J. Budzynski

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Dated: 6/21/14

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CERTIFICATE OF SERVICE
AFFIRMATIVE DEFENSES

I hereby certify that on June 21, 2014, I electronically filed the foregoing Paper(s) with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Gary D. Nitzkin
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and I hereby certify that I have mailed by United States Postal Service the Paper(s) to the following non-ECF participants:

/s/ Marilyn E. Lewis
Secretary to
Thomas J. Budzynski P26355
Thomas J. Budzynski PC
Attorney for Defendant
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